



19/12/2022

TRANSPORT FOR NSW

PO Box K659,

HAYMARKET NSW 1240.

By Email: [sydneyharbourbridgeprojects@transport.nsw.gov.au](mailto:sydneyharbourbridgeprojects@transport.nsw.gov.au)

## **SYDNEY HARBOUR BRIDGE CYCLEWAY NORTHERN ACCESS PROPOSAL REVIEW OF ENVIRONMENTAL FACTORS – NOVEMBER 2022 - NORTH SYDNEY COUNCIL RESPONSE**

I refer to the *Sydney Harbour Bridge Cycleway Northern Access proposal - Review of Environmental Factors* (REF) – dated November 2022, as advertised for comment by Transport for NSW (TfNSW). A copy of Council's submission on the REF is attached herewith, as endorsed by Council at its meeting of 12 December 2022.

Council supports Active Transport and the need to provide equitable access for cyclists and users other forms of wheeled active transport to the Sydney Harbour Bridge, as an important regional cycleway link. However as outlined in the submission, Council strongly opposes the proposal in its current form and location.

The proposed linear overhead ramp coming off the existing cycleway south of the existing Bridge (cycleway) stairs and landing in the centre of Bradfield Park North, with associated on-ground and on-street cycle way works, will cause unacceptable impacts to the open space, heritage, and pedestrian environments of this section of Bradfield Park and Alfred Street South.

Whilst TfNSW may believe the proposal as outlined in the REF represents the best solution for wheeled active-transport users, it is clearly to the substantial detriment of other users of the parkland, street environment and businesses in the area. The TfNSW linear ramp severely diminishes key Place values, and it works against Council's adopted master plan for Bradfield Park.

Council and the community stand willing to work together with TfNSW on a design and location that meets the needs of wheeled active transport users, but that also respects the needs and values of all stakeholders – a win-win outcome.

Therese Manns

**GENERAL MANAGER**

**Attachment:** Submission from North Sydney Council to Transport for NSW - 19/12/2022

RE: *Sydney Harbour Bridge Cycleway Northern Access proposal - Review of Environmental Factors* – November 2022 – North Sydney Council Response



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## SUBMISSION TO:

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PO Box K659,

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## RE: SYDNEY HARBOUR BRIDGE CYCLEWAY NORTHERN ACCESS PROPOSAL - REVIEW OF ENVIRONMENTAL FACTORS – NOVEMBER 2022 - NORTH SYDNEY COUNCIL RESPONSE

### Overview

North Sydney Council strongly objects to the Transport for NSW (TfNSW) proposed cycle ramp design and location as advertised in the *Sydney Harbour Bridge Cycleway Northern Access proposal - Review of Environmental Factors* (REF) – dated November 2022. The proposal outlined in the REF, which includes a substantial overhead ramp structure coming off the western side of the bridge (existing cycleway) south of the existing bridge stairs and landing in the centre of Bradfield Park North and associated on-ground / on-street cycle-way facilities, will have unacceptable impacts on the parkland, heritage, and the public domain of the Milsons Point area, particularly to the area north of Burton Street to Lavender Street, including Bradfield Park North and Alfred Street South.

The TfNSW proposal greatly impacts the character, heritage, and amenity of Bradfield Park North and Alfred Street South. There is strong concern in the local community over the impact of the proposed ramp and associated cycleway works on the Milsons Point area, especially in regard to open space amenity, pedestrians, heritage, traffic, and parking. Peak advocacy bodies for Sydney's built engineering heritage, landscape heritage and local history also share many of Council's and the community's concerns.

Council is of the view that the REF substantially downplays the levels of impact. The level of detail provided in the REF in terms of drawings and illustrations of the proposed works and associated visual impact analysis is also lacking, such that the true impacts of the proposed changes are not clearly portrayed. The omission of critical information needs to be corrected in the public interest.

Council supports the improvement and expansion of cycling facilities, particularly with the aim of providing equitable access for less able riders of bicycles and other forms of wheeled active transport. However, in the TfNSW proposal, more desirable strategic opportunities for improving the Sydney Harbour Bridge regional cycling connection have been dismissed. At considerable expense, in terms of both capital investment and impacts on the public domain, the current proposal connects new infrastructure to an existing sub-standard cycleway.

The TfNSW proposal works against Council's adopted master plan for Bradfield Park, reversing many of the design improvements undertaken by Council in Bradfield Park North for the master plan. Council requests TfNSW to pursue a more visionary outcome, that does not impact other members of the public and the environment to the severe extent that the current ramp proposal does.

The current proposal is in the wrong location, does not respond to context or respect values of Place and ignores key community values and concerns. If TfNSW deems a ramp coming off the Bridge to ground in the Milsons Point is the best solution for access to the Bridge cycleway, then Bradfield Park Central affords a superior / less impactful opportunity – an opportunity to enhance Place and create an outcome that will work for the broadest range of stakeholders.

### **Owners Consent**

Council owns much of the land that is to be impacted (it was granted by proclamation of NSW Parliament under freehold title to North Sydney Council in Trust for Parks and Recreation following completion of the bridge). No consent has been granted by Council for TfNSW to make application for approval to undertake the development or activity. In addition, owner's consent has not been provided for application to NSW Heritage under Section 60 of the Heritage Act.

TfNSW have separately advised that they intend to compulsorily acquire the parkland to undertake the development, including temporary construction leases and permanent acquisition of sections impacted by structure (pylons and the like). This adversarial approach is highly concerning and upsetting to many in the community. If TfNSW was willing to work with Council on a solution that is best-fit for both its context and the broadest range of affected stakeholders, compulsory acquisition may not be required. This would save TfNSW time and expense and result in better community relations.

### **Planning Context**

Transport for NSW advises in the REF that they are within their rights to utilise the provisions of the *State Environmental Planning Policy (Transport and Infrastructure) 2021* (the SEPP). The REF notes: *"Section 2.109 of the SEPP permits development on any land for the purpose of a road or road infrastructure facilities to be carried out by or on behalf of a public authority without consent. The definition for road infrastructure facilities.... includes 'road related areas' within the meaning of the Road Transport Act 2013 (Road Transport Act). The definition for a road related area under that Act includes 'an area that is open to the public and is designated for use by cyclists'."*

This is an excessively broad interpretation of the provisions of the SEPP and the Act and the implications for parkland and public open space are highly concerning. To utilise such provisions to drive a high-impact cycle-ramp through Bradfield Park is clearly not the intent of the legislation. Under the SEPP provisions TfNSW propose to apply a Part 5 (EPA Act) self-assessed approvals process, requiring a Review of Environmental Factors (REF) only, rather than the more rigorous Part 4 (EPA Act) Integrated Development Application process which requires an Environmental Impact Statement and assessment by Council or the Department of Planning. The impacts of this project are so significant that they warrant the more rigorous process, so that the full implications are clearly and fully understood and communicated to the community, and all checks and balances are made by an approval authority separate to the proponent authority.

Council strongly disagrees with TfNSW's assessment of the impacts in regards consideration of Section 171 factors, as outlined in *Appendix A*. To assert, as the assessment does, that there is *Nil* impact with respect of *Factor a) Transformation of a Locality* shows a serious lack of understanding of the values of the place upon which the ramp imposes. To assert with respect to *Factor d) Any reduction of the aesthetic, recreational, scientific or other environmental quality or value of a locality?* and *Factor e) Any effect on a locality, place or building having aesthetic, anthropological, archaeological, architectural, cultural, historical, scientific or social significance or other special value for present or future generations?*, that the impacts are minor in the short term (during construction) but positive in the long-term (during operation) is similarly mis-guided.

Furthermore, with respect to the provisions of the Environment Protection and Biodiversity Conservation Act, 1999 (EPBC Act) legislation, Council disagrees with TfNSW's assessment that the level of impact is such that it does not warrant formal referral to the Commonwealth Government under the EPBC Act provisions.

## Strategic Context

The Harbour Bridge cycleway, as TfNSW point out is a key strategic link in the greater metropolitan area's regional cycleway network, being the main connection for cyclists journeying between the northern and southern sides of Sydney Harbour. The regional network map for the Eastern Harbour City produced by TfNSW (with the Harbour Bridge link marked up for the purposes of this report with a red arrow) clearly illustrates this:



The Executive Summary and Section 2 of the REF include many aims and objectives relating to the need to improve regional cycling links, to support the uptake of cycling due to associated benefits to health, traffic congestion and the like. These are commendable aims and objectives.

However, the rationale for TfNSW settling upon the ramp scheme to address these regional link shortcomings is not clear. The proposed ramp takes cyclists (the majority of whom are commuting through North Sydney to areas beyond) down into the busy congested urban environment of Milsons Point, where they would be competing with pedestrians and traffic, only to have to then engage with the hilly climb out of the Milsons Point as the topography rises to the north. Cyclists then must traverse the busy North Sydney CBD environment as they journey to their destination.

Regional users are best served by maintaining an on-grade route alongside the existing Bradfield Highway / Warringah Freeway corridor. Those cyclists who wish to access North Sydney CBD and surrounding local suburbs are thence best served by the east-west connections off the regional route to the local cycleway network (for example Ridge Street, Ernest Street connection). Work carried out on the Draft North Sydney Integrated Transport Strategy advocates this approach, including the connection south along the corridor to connect with the Lane 8 proposal, informed by the detailed work of Council's Strategic Transport Planners and developed through a series of meetings between Council officers and TfNSW.

The current TfNSW ramp proposal dismisses several key considerations, including the inadequacies of the existing substandard cycleway on the Bridge, and the opportunities afforded by the current mega-road infrastructure projects through and under North Sydney. The existing pathway forming the Harbour Bridge cycleway was not built for cyclists. As TfNSW would be aware, JJC Bradfield designed this path as a pedestrian walkway, to mirror the same facility on the eastern side of the Bridge. Hence why the facility terminates at the northern end with a set of stairs and why the existing bridge cycleway does not meet modern best practice cycleway standards. Security upgrades added in the wake of the 9/11 terrorist attacks in the U.S. narrowed the cycleway, rendering it even less compliant.

Spending considerable resources on a ramp that perpetuates this long-standing unsatisfactory situation is a questionable investment. Given the clearly demonstrated importance of the Harbour Bridge as a key regional link for cycling, it is even more important that cyclists and other users of wheeled active transport using it be afforded best-practice infrastructure.

The TfNSW ramp solution dismisses the visionary opportunities afforded by the current, once in-a-generation infrastructure Western Harbour Tunnel – Westconnex mega-project. This includes seizing the opportunity to leverage the modelled capacity gains on the Harbour Bridge (and existing harbour tunnel) in order to dedicate a proper best-practice dual separated cycleway on the deck of the Bridge per the Lane 8 proposal.

At its meeting on 23 May 2022, Council resolved:

*THAT Council continues to advocate for a dedicated lane for cycling and active transport on Lane 8 of the Sydney Harbour Bridge and urges TFNSW to continue to pursue this option.*

The Lane 8 proposal also has clear synergies with the vision for the Cahill expressway re-imagining which has been the subject of a number of recent NSW Government announcements and is currently being worked on by the NSW Government. Extending the Lane 8 proposal to the Cahill Expressway, in conjunction with that exciting vision, would create a world-class cycling experience. It would also free up the western bridge walkway to be returned to its originally designed purpose – a pedestrian walkway. Thus, pedestrians could enjoy a return journey via a different side of the bridge, enabling them to take in a differing view of the city and harbour and increasing pedestrian capacity at the same time as cycling capacity.

## Project Objectives

The executive summary of the REF and Section 2 of the REF lists many project aims and objectives. Whilst the proposal may meet the objectives that relate to improving access to the Harbour Bridge by removing the need to use the existing stair / ramp access, the project fails to meet or falls short on most of the other objectives. For ease of reference these are listed in tabular format below, with Council comment in the adjacent column:

<b><i>TfNSW Stated Objective (from REF)</i></b>	<b><i>Council Comment</i></b>
<ul style="list-style-type: none"> <li>• <i>Improve safety for bike riders, pedestrians, and motorists:</i></li> </ul>	<i>The design potentially induces pedestrian - cyclist conflict in areas where there were no issues previously.</i>
<ul style="list-style-type: none"> <li>• <i>Improve access for bike riders and pedestrians:</i></li> </ul>	<i>Aside from the new pedestrian crossing, the proposal disadvantages pedestrians over the current arrangement and restricts direct pedestrian access to Bradfield Park North. The proposal fragments the Bradfield Park Heritage walk and impacts existing pedestrian desire lines in order to prioritise the cycle ramp and associated cycleway.</i>
<ul style="list-style-type: none"> <li>• <i>Improve access to the Sydney Harbour Bridge Cycleway</i></li> </ul>	<i>The proposal achieves improved access to the existing cycleway; however, the existing bridge cycleway remains sub-standard.</i>
<ul style="list-style-type: none"> <li>• <i>Achieve a high-quality urban design and heritage outcome:</i></li> </ul>	<i>The proposal is significantly disruptive to the existing high-quality amenity and character of Bradfield Park North and Alfred Street South, and results in severe heritage impacts.</i>
<ul style="list-style-type: none"> <li>• <i>Release latent capacity on the Sydney Harbour Bridge Cycleway</i></li> </ul>	<i>No comment.</i>
<ul style="list-style-type: none"> <li>• <i>Provide a cycleway facility that sensitively fits in with the:</i></li> </ul>	
<ul style="list-style-type: none"> <li>– <i>Context of the location including the potential visibility of the structure</i></li> </ul>	<i>The proposal does not sensitively fit in with the context of the location, rather it detrimentally imposes on the location.</i>
<ul style="list-style-type: none"> <li>– <i>Heritage values of the area</i></li> </ul>	<i>The proposal does not sensitively fit in with the heritage values of the area, rather it actively obscures and competes with the heritage values.</i>



<b>TfNSW Stated Objective (from REF)</b>	<b>Council Comment</b>
<ul style="list-style-type: none"> <li>– Architectural qualities of the Sydney Harbour Bridge.</li> </ul>	<p>The proposal does not sensitively fit in with the architectural qualities of the Sydney Harbour Bridge. Engineering Heritage peak bodies have described the ramp structure in front of the Harbour Bridge architectural heritage features as like ‘putting a slash across the Mona Lisa’ or ‘Milsons Point’s version of the Cahill expressway’.</p>
<ul style="list-style-type: none"> <li>• To support these objectives, the proposal also aims to:</li> </ul>	
<ul style="list-style-type: none"> <li>– Minimise impacts to the natural and built environment</li> </ul>	<p>The project involves substantial adverse impacts to the natural and built environment</p>
<ul style="list-style-type: none"> <li>– Minimise impacts to the community</li> </ul>	<p>The project involves very substantial impacts to the community</p>
<ul style="list-style-type: none"> <li>– Deliver a cost-effective solution.</li> </ul>	<p>Insufficient information to comment.</p>

(Ref: Section 2.4.1 Proposal Objectives)

<b>TfNSW Stated Objective (from REF)</b>	<b>Council Comment</b>
<p>The primary objectives of the proposal are aligned with the strategy as it would:</p>	
<ul style="list-style-type: none"> <li>• Optimise the existing cycling link between Sydney CBD and North Sydney CBD and connect these key centres and regional communities</li> </ul>	<p>The proposal improves access to the existing cycling link, but it does not optimise it.</p>
<ul style="list-style-type: none"> <li>• Promote cycling as an alternative and sustainable mode of transport and encourage a wider range of customers to pursue active transport as an effective mode of transportation, which could lead to potential opportunities for decreased congestion on surrounding road networks</li> </ul>	<p>The proposal may increase congestion on an already congested Alfred Street South road network.</p>
<ul style="list-style-type: none"> <li>• Promote a healthier lifestyle by encouraging people to adopt cycling as a form of transportation</li> </ul>	<p>The proposal may encourage some people to adopt cycling.</p>
<ul style="list-style-type: none"> <li>• Improve safety for bike riders of all ages and abilities by providing greater accessibility to the Sydney Harbour Bridge Cycleway, by eliminating the bottleneck created by the existing stairway access, which poses a potential safety risk and a barrier to a wide range of customers.</li> </ul>	<p>The proposal provides greater accessibility to the SHB cycleway. However, it concentrates all cyclists to the bottom of the ramp in the centre of Bradfield Park North which is likely to become a pedestrian – cyclist conflict zone. The ramp also only saves a few seconds off the typical cycle trip across the bridge, so claims of a ‘bottleneck’ being a substantive issue to be resolved are unfounded.</p>

(Ref Sect 2.2.1 Page 25)

<b>TfNSW Stated Objective (from REF)</b>	<b>Council Comment</b>
<i>The development criteria for the proposal are to:</i>	
<ul style="list-style-type: none"> <li>• Allow for convenient access to/from Sydney Harbour Bridge without the need for bike riders to dismount</li> </ul>	Convenient access for cyclists is achieved, at the expense of pedestrians, vehicles, and park users generally.
<ul style="list-style-type: none"> <li>• Create a safe, direct cycleway connection to the bike network and utilise latent capacity on the Sydney Harbour Bridge Cycleway</li> </ul>	The proposal provides a connection to the existing bridge cycleway, however potential safety concerns exist.
<ul style="list-style-type: none"> <li>• Avoid conflict and obstruction to path of travel and provide safe separation between bike riders and other transport modes to allow bike riders to feel safe and confident using the cycleway</li> </ul>	The proposal improves the path of travel for cyclists at the expense of pedestrians, other modes of travel and parkland users.
<ul style="list-style-type: none"> <li>• Ensure all rider types and abilities can experience riding over the Sydney Harbour Bridge with a high level of customer satisfaction and comfort</li> </ul>	As noted earlier, the Harbour Bridge cycleway is sub-standard.
<ul style="list-style-type: none"> <li>• Maintain the function of events such as weekend markets and consider potential for new uses</li> </ul>	The weekend markets are already successfully operating; however they will be significantly disrupted by construction of the ramp.
<ul style="list-style-type: none"> <li>• Enhance the public domain and minimise visual and physical clutter</li> </ul>	The existing public domain of Bradfield Park North is substantially detrimentally affected
<ul style="list-style-type: none"> <li>• Enhance views and open space, and increase tree canopy</li> </ul>	Fails in respect of views and open space. Insufficient information to determine tree canopy claim
<ul style="list-style-type: none"> <li>• Protect cultural heritage by protecting significant views, retaining cultural significance of Milsons Point Railway Station, avoid/minimise changes to fabric of precinct, avoid cumulative impacts on the Sydney Harbour Bridge</li> </ul>	The proposal fails in respect of protecting cultural heritage, views, and open space. Substantial negative changes & additions to existing fabric are proposed.
<ul style="list-style-type: none"> <li>• Design with Country to acknowledge and respectfully incorporate Aboriginal cultural connections</li> </ul>	No comment
<ul style="list-style-type: none"> <li>• Design excellence to ensure a high-quality design and process for the proposal's integration with the surrounding precinct</li> </ul>	The ramp imposes on - rather than integrates with - the surrounding precinct.
<ul style="list-style-type: none"> <li>• Provide a solution that is compliant, constructable, maintainable, appropriately lit, allows Crime Prevention Through Environmental Design (CPTED), is sustainable, adequately meets capacity demands, allows access for emergency services, and considers materiality.</li> </ul>	Through - pedestrian access to the northern end of Bradfield Park North is actively discouraged by the fragmentation of the approach wall Heritage Walk. The ramp structure creates concealed areas, and blocks open sightlines - contrary to the principles of CPTED.

(Ref: 2.4.2 Development criteria)



<b><i>TfNSW Stated Objective (from REF)</i></b>	<b><i>Council Comment</i></b>
<i>Urban design objectives for the proposal include:</i>	
<ul style="list-style-type: none"> <li><i>Provide a safe and continuous cycle connection suitable for all riding abilities</i></li> </ul>	<i>The ramp connects to the existing cycleway which is non-compliant and to the cycle connections to the north and south, which traverse steep grades.</i>
<ul style="list-style-type: none"> <li><i>Maintain and respect the heritage significance</i></li> </ul>	<i>Heritage backdrop and curtilage is substantially diminished by imposition of the ramp structures.</i>
<ul style="list-style-type: none"> <li><i>Enhance the built and natural environment</i></li> </ul>	<i>The built and natural environment is not enhanced by the proposal.</i>
<ul style="list-style-type: none"> <li><i>Deliver a high-quality, universally accessible public domain</i></li> </ul>	<i>The ramp may be universally accessible however connections to the north and south which it serves are not, and the existing high quality public domain is impacted.</i>
<ul style="list-style-type: none"> <li><i>So far as practicable protect and enhance key spaces, places, views, vistas, civic and community destinations</i></li> </ul>	<i>Place values and key views and vistas are detrimentally impacted by the ramp proposal.</i>
<ul style="list-style-type: none"> <li><i>Improve the customer experience</i></li> </ul>	<i>Achieved for cyclists at the expense of other users.</i>
<ul style="list-style-type: none"> <li><i>Preserve and enhance activity along adjacent streetscapes</i></li> </ul>	<i>Pedestrian and park user activity will be impeded.</i>
<ul style="list-style-type: none"> <li><i>Develop a place-based design language and approach</i></li> </ul>	<i>A place-based design language approach already exists in Bradfield Park, in accordance with Council's Public Domain manual and master plan for Bradfield Park.</i>
<ul style="list-style-type: none"> <li><i>Ensure high design quality, constructability, and value for money.</i></li> </ul>	<i>Value for money has not been demonstrated</i>

(Ref 2.4.3 Urban design objectives)

## **Landscape Character and Visual Impact Assessment**

Council officers and many in the local community have strong concerns over the impacts that the proposed linear ramp will have on the character and amenity of Bradfield Park North and heritage elements north of the Bridge (cycleway) stairs, particularly the blocking of the views of the unique heritage elements of the Bridge approach walls, Milsons Point Station Entrance & Forecourt, Burton Street Tunnel Archway and Bridge Stairs, but also the obscuring of ground-based elements associated with the interpretation of the footprints of the former houses and businesses that were demolished to build the Harbour Bridge, which still extensively exist beneath the park.

The landscape character assessment does not respond to the nuances of the Bradfield Park landscape. It errs in that it aggregates the entirety of Bradfield Park into one character zone that forms the basis of the main assessment matrix, as per the map extract below:




**KEY**



Milsons Point Station

Landscape character areas:

-  1. Sydney Harbour Bridge and Milsons Point Station
-  2. Bradfield Park
-  3. Recreation and Entertainment Areas
-  4. Kirribilli Village Centre

-  5. Kirribilli residential area
-  6. Milsons Point mixed use core
-  7. Lavender Bay residential area

A proper, thorough analysis of landscape character would have established that Bradfield Park (North, Central and South) consists of several quite distinct landscape character zones, each with their own unique qualities. Bradfield Park North, the area most affected by the TfNSW proposal has a number of these zones itself and is particularly abundant in features (including trees, architectural heritage elements & archaeological interpretation areas) contributing to overall landscape quality. Given this richness of elements, and being the narrowest section of Bradfield Park, wedged between the busy Alfred Street South corridor with the Milsons Point residential towers and the bridge approach walls, Bradfield Park North is especially vulnerable to impacts on landscape character.

In addition to inadequately considering the nuances of the Bradfield Park landscape character, the assessment omits Bradfield Park North, which is a defined National Heritage Place under the EPBC Act, from its description of National Landscape Sensitivity level, citing only Bradfield Park South portion of the park as being in this category.

Thus, the landscape character analysis and associated impact assessment in the REF is flawed and accordingly it downplays the extent of impact to the landscape character. Council disagrees with the conclusion that there will only be a *low-moderate* impact on the Bradfield Park landscape character area in so far as Bradfield Park North is concerned.

The view analysis / visual impact assessment contained in the REF is also severely limited, with only a few select viewpoints included, with 3D renderings of the ramp structure. The analysis omits key viewpoints critical to an understanding of the impacts, including those shown in the images below:

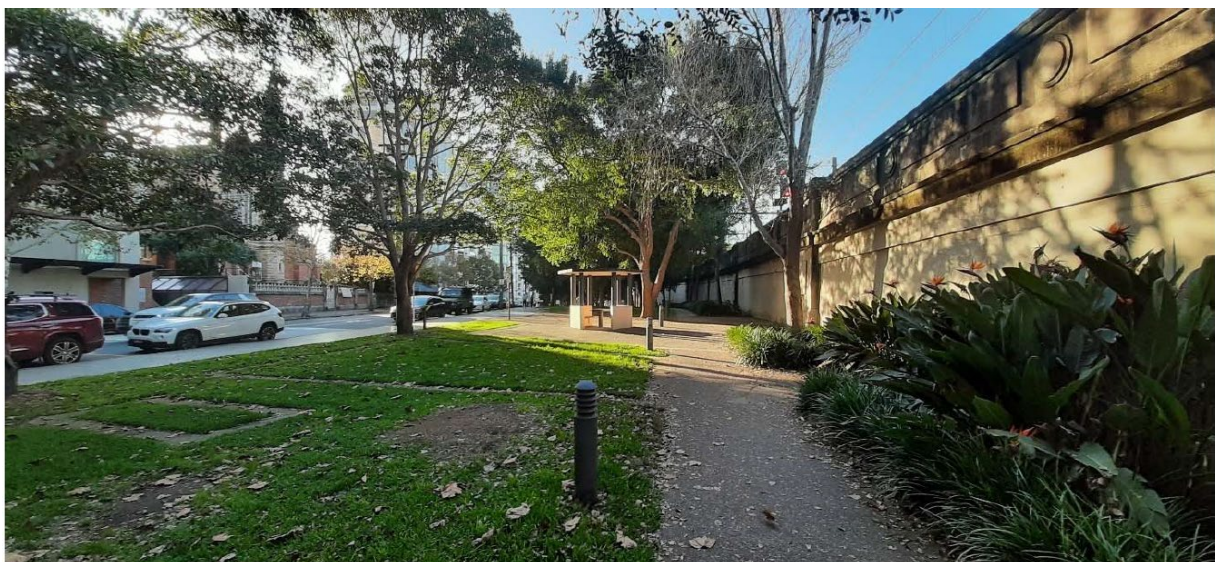


*Pedestrians enjoying the Bradfield Park North heritage walk along the Bridge wall. This path is to be removed and this view will be dominated by the under croft of the descending ramp structure. The gardens flanking the station will be removed and replaced with paving.*





*This view of the bridge wall will be blocked by the descending ramp structure which replaces the path on the left. The grass in the foreground will be replaced with a concrete path.*



*The ramp descends on the right of the image, replacing the heritage walk pathway. The rotunda in the centre of the park is to be removed. This is the only location in Bradfield Park North that receives late afternoon Winter sunlight, as pictured in the centre of the image.*





*This view of the Milsons Point Station Entrance will be severely compromised by the ramp structure.*



*The ramp imposes on and detracts from this view of the station forecourt area.*



*The ramp obscures this view of the Burton Street Tunnel Archway*

Council has been made aware that TfNSW has developed a 3D digital design model of the ramp proposal, sufficient to enable a virtual-reality walk-through experience of the ramp proposal, and from which the few selected screen shots in the REF were produced. Animated 3D walk-throughs along key pedestrian pathways and of critically affected viewpoints, including those above need to be generated and provided to Council and the community, to inform them as to the full extent of impacts of the proposal. The omission of this information from the REF is concerning, particularly when TfNSW has provided such a level of detail on other projects.

Of further concern in terms of visual impacts is the potential for a proliferation of signage, pedestrian fencing and other traffic-associated infrastructure. This is mooted in the REF as potentially being required to safely address traffic, cyclist, and pedestrian conflict points. The existing Bridge (cycleway) stairs include a number of such signs, for example those that warn pedestrians not to access the ramp, as illustrated below:



Whilst it is not indicated on the REF drawings or illustrations, it is likely that a similar range of signs would be required to address safety and compliance issues, particularly at the bottom of the ramp, and where the cycleway crosses on-ground through the centre of the park. This will further detract from the landscape character of Bradfield Park North which currently consists of a simple, open landscape beneath the tree canopy, largely uncluttered by warning and other regulatory signage.

In addition, under the TfNSW plans, the simplicity of the alignment of the Bradfield Park Heritage Walk pathway, which shadows the gentle curve of the Bridge approach wall from the station forecourt to the Heritage rockery at the northern end of Bradfield Park north, becomes fractured and discordant, subservient to the cycleway ramp and on-ground shared pathway within the park.

The Bradfield Park Heritage Walk, including the associated interpretation of the footprints of the former houses and buildings that were demolished for the building of the bridge, is a key feature of the Bradfield Park North landscape. It was opened by the granddaughter of JJC Bradfield to mark the 75<sup>th</sup> anniversary of the Bridge.

### **Tree Impacts**

TfNSW proposes to remove 7 trees as shown in the extract from the REF below. In addition, it is proposed to prune the fig tree on the corner of Burton Street and Alfred Street South to allow the entrance of construction vehicles to Bradfield Park Central which will be a Construction Zone for 18 months. It also proposed to prune 2 Chinese Elms, the canopies of which are in the way of the elevated ramp structure.





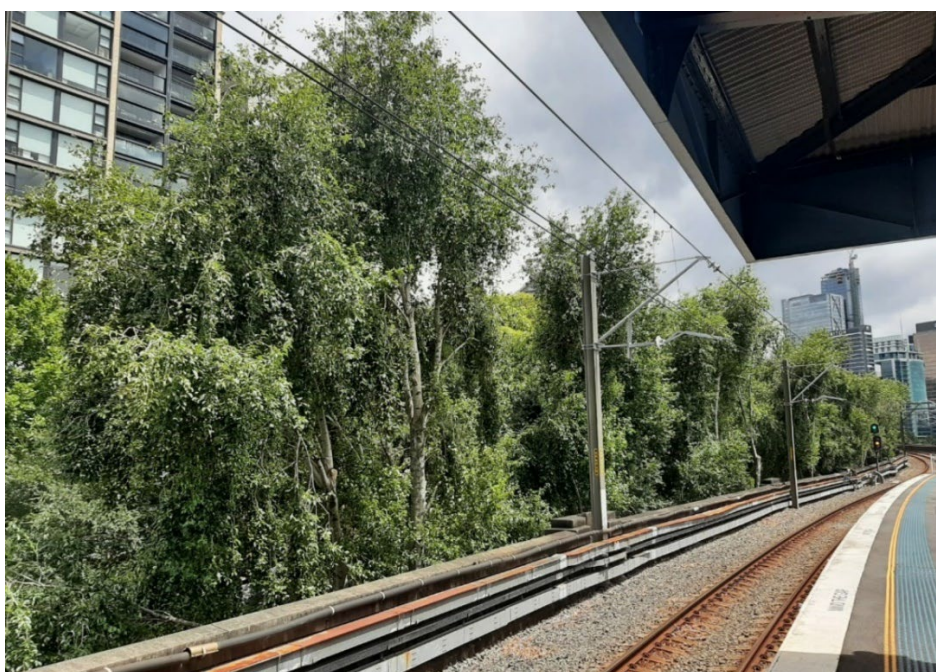
Extract from REF document, showing trees proposed to be removed, and trees to be pruned

The removal of the poplar trees along the heritage walk is not supported: these trees were planted as part of the 2003 upgrade works to interpret the original Bradfield poplar plantings, designed to emphasise the expressed pilasters of the Bridge Approach Walls. These trees provide an important visual buffer from the residences on the west side of Alfred Street to the railway and Bradfield Highway to the east. These trees also ameliorate the view from the train-line of the wall of buildings fronting the west side of Alfred Street, as shown in the images overleaf:





*The poplars to be removed under the TfNSW ramp proposal.*



*Poplars to be removed. These trees provide significant environmental benefits and visual amelioration of adjacent residential towers from the public domain.*

The removal of the palm tree within the Lavender Street roundabout is not supported: this planting is much loved as a landmark by the local community. The proposed trimming of the fig tree on the corner of Burton Street and Alfred Street South for construction access is not supported: this tree provides shade, and its canopy embraces the corner of the Burton Street Shared Zone, framing the view of the Bridge heritage features beyond. The proposed trimming of the Chinese Elms adjacent to the cycleway is not supported: these trees provide much needed shade and amenity for park users.

Accordingly, Council objects to the proposed removal and trimming of trees as proposed by TfNSW. Further, it is not clear from the information provided as to whether other trees in the park may also be affected, either during construction or permanently as part of the work (for example trees needing to be continually pruned clear of the elevated cycleway structure). It is also concerning that the arborist report included in the REF appendices is marked 'preliminary'.

### **Other Impacts to Soft Landscape**

In addition to the tree impacts, other impacts to the soft landscape include:

- removal of garden area along the bridge wall flanking the station entrance and replacement of these gardens with hard unit paving, and
- loss of grass areas north of the station and replacement of the grass with a new concrete pathway.

The garden areas were designed as part of the 2003 Bradfield Park North upgrade works that were approved by Integrated Development Application, and included a comprehensive Section 60 application to the NSW Heritage Office. The gardens are designed to frame the heritage features of the station entrance, break up the extent of hard surfaces, deal with drainage issues, and provide separation of the pedestrian pathway from the bridge approach walls, to enable the walls to be appreciated at a distance from the adjacent pathway. By placing the hard paving immediately adjacent to the wall, these important design features are lost. Accordingly, the proposed removal of garden areas along the bridge wall and their replacement with hard paving is opposed.

Regarding the removal of grassed areas and replacement with a new concrete pathway, this is best illustrated in the image below:



*Under the TfNSW plans, the grassed area in the foreground of the image above is removed and replaced with a concrete pathway. The existing pathway to the left of image is removed, becoming under-croft space to the ramp.*



The section of grass proposed to be replaced by concrete path is the most verdant, healthiest area of easily accessible grass in the whole of Bradfield Park North. Whilst the station forecourt radial layout also features well-established grass areas, these areas are not accessible. The proposed grass to be removed also provides a visual lead-in between the forecourt grass areas and the park further to the north. Accordingly, the proposed removal of grassed areas and replacement with concrete pathway is opposed.

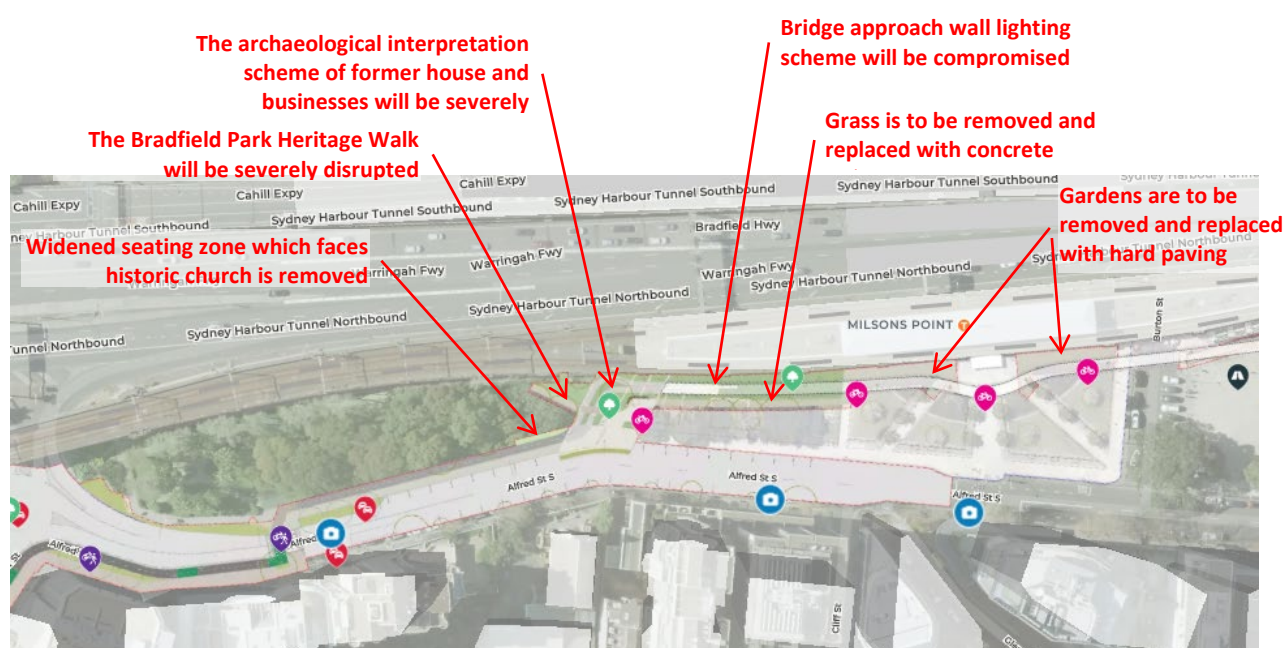
The design and location of the ramp will also create difficulties to establish the proposed garden areas beneath the ramp due to the rain shadow effect. It will also create maintenance difficulties for Council staff who would need to access the constrained spaces beside and under the ramp.

### Impacts to Hard Landscape

The TfNSW proposal includes extensive disruptive / removal works to the existing hard landscape elements of the park. These include:

- realignment and fragmentation of the Bradfield Park Heritage Walk pathway (much of its length is replaced by the route of the overhead ramp)
- removal / disruption of the heritage footprints archaeological interpretation areas
- narrowing of the Alfred Street South pedestrian pathway
- removal of the Rotunda and other popular seating areas
- impacts on the existing bridge wall lighting scheme, and

As noted earlier, the Bradfield Park North upgrade works, of which the above elements form a key design component, were approved by Integrated Development Application, including a comprehensive Section 60 application to the NSW Heritage Office. The design responds sensitively to the heritage and landscape features of Bradfield Park North and was adopted by Council following extensive community consultation. It has been a much-loved landscape since being opened in 2003.



Extract from the TfNSW interactive map marked up showing some of the key amenity impacts.

Accordingly, Council objects to the proposed works to the hard landscape elements of the park, including the realignment and fragmentation of the Bradfield Park Heritage Walk pathway, removal/disruption of the heritage footprints archaeological interpretation areas, narrowing of the Alfred Street South pedestrian pathway, removal of the Rotunda, impacts on the existing bridge wall lighting scheme and removal of existing seating areas.

## Heritage Impacts

The Sydney Harbour Bridge is heritage-significant and is recognised as one of the world's most famous bridges. It is a focal point for tourism to Sydney, and symbolises national pride. With the Opera House at Bennelong Point, the Bridge has become an important iconic image, not only for Sydney, but also Australia as a whole.

For this reason, the Bridge and its curtilages, notably including [Bradfield Park North](#), has been heritage listed by a number of agencies including the Department of Climate Change, Energy, the Environment & Water, Heritage NSW, Transport for NSW, Transport for NSW (Rail) and the National Trust. Bradfield Park is included within the listings for its importance in providing curtilage and setting to the Bridge and its approaches.

A summary of the heritage listings is given in the table below:

Listing	Number	Name	Location
National Heritage List (NHL)	105888	Sydney Harbour Bridge	Bradfield Highway and North Shore Railway, Milsons Point/Dawes Point, NSW 2000
State Heritage Register (SHR)	00781	Sydney Harbour Bridge, approaches and viaducts (road and rail)	Bradfield Highway and North Shore Railway, Milsons Point/Dawes Point, NSW 2000
SHR	01194	Milsons Point Railway Station Group	North Shore railway, Milsons Point, NSW 2061
Roads and Traffic Authority (now TfNSW) Section 170	4301067	Sydney Harbour Bridge, approaches and viaducts	Bradfield Highway and North Shore Railway, Milsons Point/Dawes Point, NSW 2000
Transport Asset Holding Entity (TAHE) Section 170	4801059	Sydney Harbour Bridge (Rail Property Only)	Arthur and Argyle Streets, Sydney, NSW 2000
TAHE Section 170	4801026	Milsons Point Railway Station	Alfred Street, Milsons Point, NSW 2061

<sup>1</sup> GML Heritage. *Sydney Harbour Bridge Conservation Management Plan*. Prepared by GML and Transport for NSW, 2021.

The Bridge, its approaches, and Bradfield Park are similarly scheduled as heritage items in the North Sydney Local Environment Plan 2013, in recognition of their importance to North Sydney.

The Heritage Impact Statement submitted within the REF identifies that the impacts to the Sydney Harbour Bridge, its approaches and to Bradfield Park will be 'neutral', 'minor', 'moderate' or 'high', some with 'direct physical and visual impact'. When following best planning practice, 'moderate impact' is to be avoided, and the design modified accordingly. Consultation with major heritage stakeholders, including Heritage NSW, TfNSW, Department of Climate Change, Energy, the Environment and Water (DCCEEW) and the National Trust, has identified heritage concerns.

Specifically, when assessed against the TfNSW Sydney Harbour Bridge Conservation Management Plan (CMP), which sets out clear policies for the on-going maintenance, management and evolution of the Bridge, the proposal fails.

The proposal does not comply with the policies in the TfNSW CMP in that it fails to conserve Policies 11 and 12:

***Policy 11—Maintaining Key Views of the Sydney Harbour Bridge in its Setting***

- 11.1 The significant physical and visual character of the Sydney Harbour Bridge within its harbour setting should be appropriately conserved.*
- 11.2 Views and vistas to and from Sydney Harbour Bridge to the north, south, east and west should be maintained.*
- 11.3 Buildings or large plantings on the harbour foreshores of Dawes Point and Milsons Point should not obscure the visual form and setting of the Sydney Harbour Bridge.*
- 11.4 Buildings or large plantings on the northern or southern sides of the harbour should not obscure or detract from the views from the Sydney Harbour Bridge toward the Sydney Harbour and the city.*

***Policy 12—Retention of Existing Open Space for Public Use/Recreation***

- 12.1 The existing park areas adjacent to the Sydney Harbour Bridge should remain public parks for passive recreation and unimpeded views to the bridge.*
- 12.2 The future management of the Sydney Harbour Bridge, approaches and parklands should appropriately conserve its character and the scale whilst retaining the existing open spaces historic viewing areas.*

The proposal chosen by TfNSW conflicts with these measures as described in the table below.

<b>HERITAGE ELEMENT</b>	<b>IMPACTS</b>
<i>The Sydney Harbour Bridge Approach Walls and steel truss viaduct</i>	<p><i>The proposal will have a severe negative impact upon the aesthetic, historic and associative significance of the bridge:</i></p> <p><i>The proposal will be visually detracting from the visual appreciation of the form, massing and scale of the bridge approaches, including the Art Deco detailing and expressed pilasters. The approach walls and viaducts are complimentary to the main bridge arch and lead the eye to its dramatic curve. Their placement in the landscape assists in defining the sheer massive scale and length of the bridge.</i></p> <p><i>It will also be visually distracting from the architectural detailing of the approach walls north of Burton Street.</i></p>



<b>HERITAGE ELEMENT</b>	<b>IMPACTS</b>
<i>The Burton Street Tunnel Archway</i>	<p><i>The proposal will cut across the elevation of the Burton Street Tunnel Archway and will partially obscure the archway when viewed from within Bradfield Park and from Alfred Street South.</i></p> <p><i>The archway is a fine example of early 20<sup>th</sup> century rendered architectural detailing. It forms part of a larger ensemble when considered together with the Milson Point Station Entrance, the western stairs and western entry to Milsons Point railway station</i></p>
<i>The Sydney Harbour Bridge Stairs</i>	<p><i>The Bradfield Park North linear ramp proposal will impact the stairs (to the SHB western cycleway) and detract from the visual appreciation of the stairs when viewed from Bradfield Park and from Alfred Street South.</i></p> <p><i>These stairs form a pair with the stairs on the eastern side of the bridge (to the pedestrian walkway). Their form needs to remain unencumbered by visually intrusive structures, such that the original design intent remains legible, and the aesthetic significance of the bridge is retained.</i></p>
<i>The Milsons Point Station entrance &amp; forecourt</i>	<p><i>The proposal will visually detract upon the Milsons Point Station Entrance portal, including the decorative Art Deco lighting when viewed from Bradfield Park and Alfred Street South.</i></p> <p><i>The radial layout of the railway entrance forecourt still retains landscape features designed by Dr J.J.C. Bradfield. Alterations to this layout and its plantings will detract from its aesthetic and historic significance.</i></p>
<i>Bradfield Park North Landscape Curtilage</i>	<p><i>The proposal will have severe detrimental impact on the character and setting of Bradfield Park North which is described as having 'Exceptional Significance' for its importance in providing unique and uninterrupted views of the Bridge and its approaches.</i></p> <p><i>The proposal will detract from the Bradfield Park Heritage Walk which includes interpretative sandstone paving stones that identify the former layout of dwellings that were demolished for the construction of the Bridge. This was developed in consultation with Heritage NSW and opened on the 75<sup>th</sup> anniversary of the bridge by the late granddaughter of JCC Bradfield, Ms Shirley Fox.</i></p>

Council disagrees with the self-assessment by TfNSW that determined the matter does not require formal referral in regard National Heritage under the EPBC Act. The proposal clearly has a significant adverse impact on Bradfield Park North – a [Listed Place on the National Heritage Register](#) for its Outstanding Heritage Value to the nation.

It is also concerning that TfNSW appears to have gone against the advice of its own [heritage report](#), which under Section 3.8 'Heritage Opportunities' identified Bradfield Park Central as the preferred location for a sympathetically designed new built element.

### 3.8 Heritage Opportunities

#### 3.8.1 Design Opportunities

There is potential for changes or development within the Bradfield Park site that could produce a positive heritage impact on the significance and setting of the Sydney Harbour Bridge and Milsions Point Station whilst also improving the public domain.

- 1 Bradfield Park Central is located outside the curtilage of the Sydney Harbour Bridge, Milsions Point Station and the LEP listing for Bradfield Park. Former Kimball Bowling Club is not listed as a heritage item. This provides a potential site for a sympathetically designed new built element.
- 2 There is an opportunity to enhance views from the cycleway towards the Sydney Harbour Bridge and the harbour by providing a high level viewing platform.
- 3 Views could be enhanced through sympathetic interpretive landscaping. Potential to implement Designing with Country principles - the Country was once Eastern and Northern Banksia Scrubland.
- 4 There is an opportunity to retain and conserve the original cycleway stairs with minimal change.
- 5 There is an opportunity to introduce a new built element, separated from the SHB, with minimal impacts to original fabric.
- 6 There is an opportunity to reinstate the Bradfield ground plan which in turn would improve views to the approaches to the Sydney Harbour Bridge from Alfred Street and Bradfield Park by relocating the North Sydney Council building.
- 7 There are opportunities for enhanced heritage interpretation relating to the natural environment and Aboriginal cultural themes. Any significant fabric required to be removed could be relocated and interpreted in Bradfield Park.



Legend

- REINSTATE ORIGINAL BRADFIELD GROUND PLANE
- SIGNIFICANT VIEWS - SYDNEY HARBOUR BRIDGE
- SIGNIFICANT VIEWS OF MILSIONS POINT STATION
- WORLD HERITAGE BUFFER ZONE
- SHB NATIONAL HERITAGE CURTILAGE
- SHB HERITAGE ITEM
- LEP HERITAGE ITEM

Figure 110: Sydney Harbour Bridge - Northern Cycleway - Summary of Heritage Opportunities. Source: TZS Architects, 2021.

### Pedestrian Impacts

Existing pedestrian amenity is substantially compromised by the TfNSW cycle ramp and cycle path proposal. The REF claims that the proposal is a 'pedestrian upgrade'. Whilst this may be true for specific areas of the proposal, such as the pedestrian crossing proposed for the northern end of Alfred Street South, the net result for most of the impacted project area is a pedestrian *downgrade*, with the cycle ramp and cycle way prioritised over pedestrian amenity. Concerningly, pedestrian-cyclist conflict points are potentially created by the design. Pedestrians using the eastern Alfred Street south footpath who wish to avail themselves of the amenity of Bradfield Park North are forced into conflict with cyclists using the cycleway at two critical crossing points, as well as for the entire section frontage of Bradfield Park North (between the location of the existing Rotunda and the proposed pedestrian crossing point at the northern end of Alfred Street South.)

The pedestrian path along the Bradfield Park North frontage, south of the proposed pedestrian crossing is to be narrowed to 2.25 metres from approximately 3.5 metres. This reduction is considered inadequate for the pedestrian flows experienced and is contrary to the principles of the master plan to which Council worked for the 2003 design upgrade, which sought to provide a generous footpath along the frontage of Bradfield Park north as part of the grand promenade down to the Bridge and harbour foreshore.

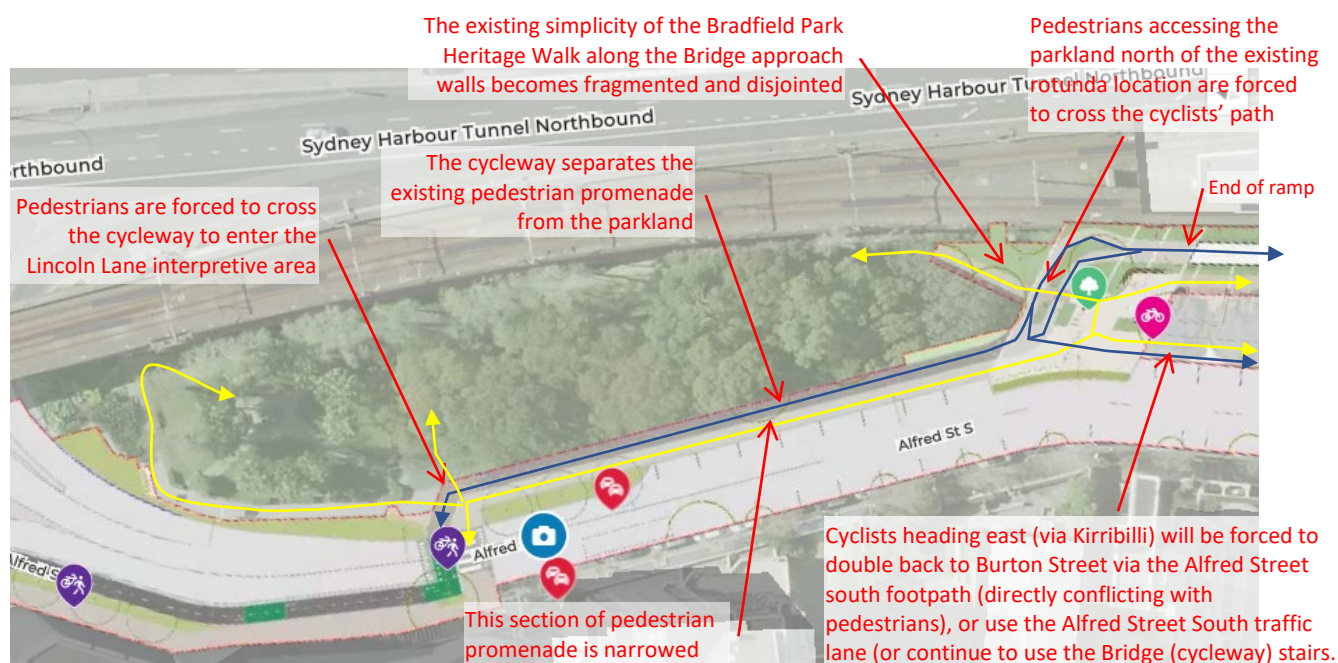
Furthermore, pedestrians will be corralled between the kerb and the designated cycleway, the latter which runs parallel to the path between the path and the parkland. This is an unacceptable urban design outcome and a poor outcome for the many pedestrians that use this path daily. The poor outcomes for pedestrians, and park users generally are further exacerbated in that pedestrians are forced to cross the cycleway at critical points to enter the northern part of Bradfield Park North (north of the existing Rotunda, which is to be removed under the TfNSW proposal). This creates an uneasy relationship between the parkland and pedestrians who will no longer have unfettered access along the park frontage.

In addition, the existing seamless pedestrian connection between the heritage interpretation paved area representing the former Lincoln Lane, a key feature of the 2003 upgrade and heritage interpretation scheme developed in liaison with the NSW Heritage office, will be severed by the cycleway, which cuts between this area and the pedestrian footpath. This is a poor urban design outcome and an equally unfortunate outcome for both pedestrians and park users.

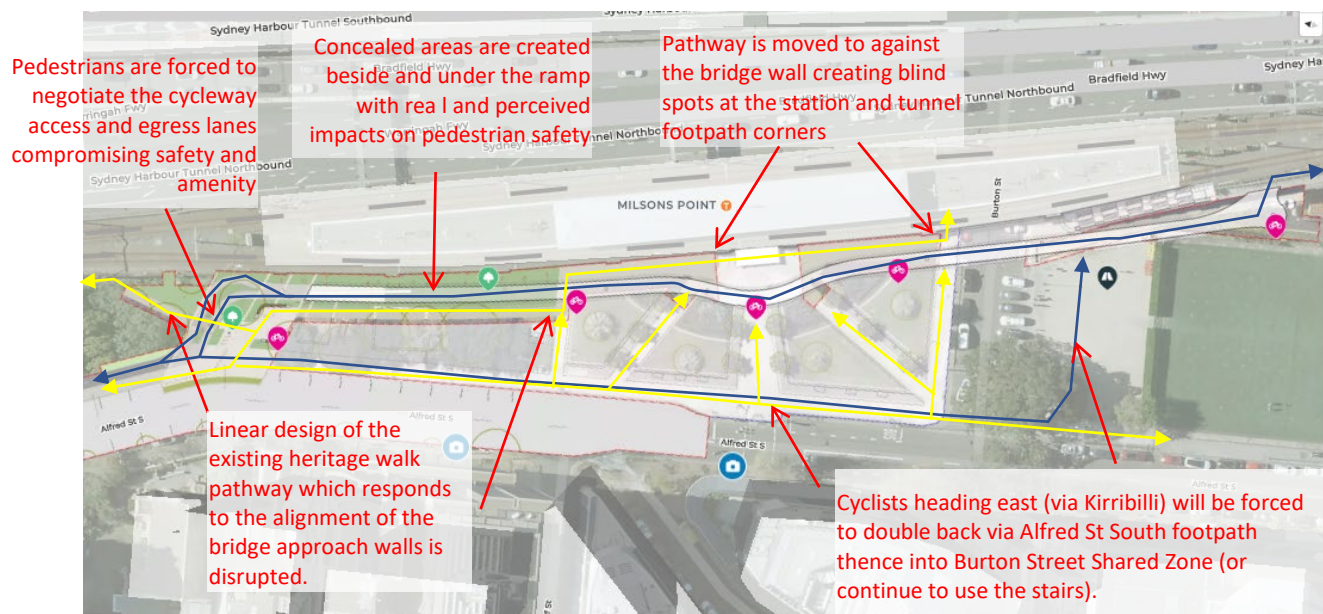
Cyclists heading east via Kirribilli will also be forced to double-back to the Burton Street Tunnel underpass via the Alfred Street south footpath, bringing them into conflict with pedestrians on the journey south to Burton Street, or to use the Alfred Street South traffic lane, or continue to use the Bridge (cycleway) stairs. Currently cyclists heading east disperse onto the Burton Street Shared Zone and make their way directly through the tunnel underpass to the Kirribilli side.

Removal of the garden areas outside the station entrance (as referred to under Landscape Character & Amenity Impacts) and the associated proposed placement of the main north-south pedestrian against the bridge approach wall, rather than having a separation as exists now, will create potential blind spots where pedestrians enter exit the station concourse and the northern side footpath of the Burton Street tunnel. The ramp as designed will also create concealment areas beneath the ramp and between the ramp and the bridge wall. These negative impacts are contrary to the principles of Crime Prevention Through Environmental Design (CPTED) and will make pedestrians feel unsafe, further diminishing the values of Bradfield Park North as public open space.

These impacts are illustrated on a mark-up of the map provided on the TfNSW website as illustrated overleaf:



Section of interactive map showing northern end of Bradfield Park North marked up with the poor outcomes for pedestrian / park users under the TfNSW ramp / cycleway proposal.



Section of interactive map showing southern end of Bradfield Park North marked up with the poor outcomes for pedestrian / park users under the TfNSW ramp / cycleway proposal.

From observations over a period of almost twenty years since the Bradfield Park North upgrade works were undertaken, pedestrians and cyclists have been observed to peacefully co-exist in the section north of the existing Bridge (cycleway) stairs to Lavender Street. After exiting the stairs, cyclists disperse via the Burton Street Shared Zone, northwards in several ways. The majority use the Alfred Street South traffic lane to make their way north, a smaller number use the Alfred Street South eastern-side footpath (which was widened in 2003 to accommodate shared use), whilst a minority head directly across Burton Street and travel north on the Heritage Walk pathway, generally exiting onto the Alfred Street South footpath to continue their journey near the Rotunda (within the gravel area interpreting the former alignment of Willoughby Street). This pattern is repeated for cyclists heading from the north to the Bridge (cycleway) stairs. As mentioned earlier, cyclists heading to and from the east directly access Kirribilli via the Burton Street Tunnel Shared Zone.

One of the cited benefits of the proposed overhead ramp is alleviation of pedestrian-cyclist interaction in the Milsons Point Station forecourt area. As noted above, this has not been identified as a problem. The REF also cites removing cyclists from the Kirribilli Markets area as a benefit. Since the markets were relocated to Burton Street and Bradfield Park Central as part of the 2003 park upgrade works, they have operated a management regime to accommodate cyclists using the Burton Street Shared Zone to disperse in the directions indicated above. This arrangement, which includes allowing for clear passage across to the northern side of Burton Street shared zone and west to Alfred Street South, and for cyclists to dismount in the tunnel when the markets are on, has successfully operated for the almost 20 years the markets have been in that location.

### Traffic and Parking Impacts

The proposal would result in substantial changes to the Alfred Street South road-corridor environment including:



- widening of the footpath corner of Lavender Street/ Middlemiss Street intersection, and reduction in the size of the roundabout at that intersection
- a new raised pedestrian / cycleway crossing point and removal of the existing pedestrian refuges
- relocation of bus stops and replacement with an in-lane bus stop on Alfred Street South
- permanent removal of 15 parking spaces
- separated bi-directional cycleway on Alfred Street immediately adjacent to Bradfield Park North, and
- reallocation of road space including narrowing sections of the traffic and parking lanes

The community, including residents and businesses, have raised several concerns with these proposals including that:

- the design potentially induces cyclist - pedestrian conflicts at several locations and hinders pedestrian access to Bradfield Park North. The linear ramp design will encourage speed and funnel cyclists exiting the ramp at speed in a tight curve at the end of the ramp into the heavily pedestrianised Bradfield Park North / Alfred Street South footpath, which is frequented daily by over 10,000 pedestrians, resulting in a high risk to safety of cyclists and pedestrians;
- the proposed raised pedestrian and cyclist priority crossing may result in queueing along Alfred Street South, including southbound vehicles backing up into the Bradfield Highway off-ramp and along the western side of Alfred Street South for traffic travelling north. Alfred Street South is already congested at peak times;
- the proximity of the relocated bus stop to the raised pedestrian and cyclist crossing may create safety issues arising from pedestrian visibility. Its proximity to the driveway exit/entrance from 110 Alfred Street South may also cause issues with residents trying to exit/enter the building's driveway;
- loss of parking spaces will greatly negatively impact on businesses and residents. Parking spaces within Milsons Point are already at a premium. Remarkably, the REF dismisses parking impacts by saying that travelling by private vehicles to and from Milsons Point is not essential:  
*Given that the study area is well served by public transport, being located close to Milsons Point Station and bus stops, as well as active transport links, travelling by private vehicles to and from the area is not essential.*
- narrowing of parking and traffic lanes in what already is a tightly constrained street environment

Accordingly, Council objects to the proposed Alfred Street South traffic changes as summarised above.

### **Consultation & Alternatives**

TfNSW advises they have consulted with many groups in formulating their proposal, and that the process has been collaborative. However, the views of Council in regards landscape, open space and heritage impacts have largely been ignored, as have the views expressed by many in the community who are opposed to the impacts on Bradfield Park North and the Alfred Street South environment.

Other options presented by the community and Council have been dismissed by TfNSW. The REF notes TfNSW has considered a range of different configurations and locations for the proposed ramp. However, these have not been workshopped in detail with Council or the community. The process to arrive at a linear ramp coming to ground in Bradfield Park North pivoted on the selective analysis of an online survey which contained questions skewed to cycling-related issues. It would be expected that cyclists favour a linear ramp option. Such a significant intervention in a location as sensitive as is being proposed by TfNSW requires full and detailed surveying and consideration of a broad range of community values. The TfNSW proposal fails to address many of these key values. The REF is not a proper and precise examination of the likely environmental impacts of the proposed linear ramp.

A visionary solution for the long term needs to be implemented which avoids unnecessarily forcing regional commuter cyclists through steep, congested local streets, and impacts on high value parkland and heritage. Dedicating of [Lane 8 of the Harbour Bridge](#) and the east side of the expressway corridor is seen as the best strategic solution, seizing the opportunity of the Western Harbour Tunnel and Freeway upgrades underway. There is no apparent reason that implementing such a solution could not commence straight away, given that the road works are already underway on the Freeway upgrade, and as the NSW Government is working on plans for Circular Quay and the Cahill Expressway re-imagining – the logical extension of the Lane 8 proposal into the city.

However, if a ramp is to be constructed as an interim measure, it needs to be built in the right location and cause no harm. A Bradfield Park Central ramp solution (within the old bowling club site south of Burton Street) avoids devastating impacts to Bradfield Park North. Bradfield Park Central is largely undeveloped, less constrained by sensitive heritage elements, more open, and less vulnerable to impacts as compared to the highly-valued landscape of Bradfield Park North. The [foldback ramp](#) in Bradfield Park Central a concept developed by experienced designers and [peer-reviewed](#) by leading cycling experts solves the majority of the impacts that would be caused by the current linear ramp proposal.

The fold back design is a safer option for all, including cyclists and pedestrians, with the geometry designed as a low-speed environment, wider and more varied to aid users of all abilities. Utilising the existing Burton Street shared zone to disperse cyclists existing the ramp removes hazards and obstructions to pedestrian movements that are created in the linear scheme. It would serve all cyclists, not only those going north and west, and provides cyclists with multiple onward routes, dispersing them via the Burton Street Shared Zone, rather than concentrating cyclists and pedestrian to potentially dangerous conflict points and forcing pedestrians to cross the cycleway to access much of Bradfield Park North, as the TfNSW linear ramp does.

TfNSW incorrectly asserts that the concept put forward for a fold-back type ramp in Bradfield Park Central would not cater for “8 – 80-year-olds”, claiming that it is for experienced ‘commuter’ riders only. TfNSW has also claimed that the geometry of the concept for Bradfield Park Central is non-compliant and doesn’t meet international standards. An impartial reading of the peer review carried out for that scheme does not bear out such findings. To the contrary it establishes that the fold back ramp concept suits a broader range of users than the high-speed, narrower linear scheme. Furthermore, designs for recently constructed ramps locally and abroad, including a recent award-winning example in Antwerp in the Netherlands have similar or even more constrained geometry.




Should TfNSW wish to hold to that erroneous view for the Bradfield Park Central ramp concept, it can simply be addressed by combining the fold-back scheme with a lift. Together, the fold-back ramp and lift would cater for solution caters to all ages and all levels of competency of riders. Shouldn't persons of all ages and abilities (including "1-100-year-olds") have access to the wonderful experience of riding across the landmark, world-renowned Bridge?

This dual arrangement has other benefits: The lift can be built first, quickly (adapting the design for the lift on the other side to suit if feasible or a new design as necessary), whilst the design and fabrication of the ramp in Bradfield Park Central is being finalised. Having the two methods of access would build in a contingency should one or the other be offline, for example for maintenance / an incident requiring closure. The lift can also be used for pedestrian access should the cycleway convert back to pedestrian use at a time in the future.

As noted earlier, TfNSW's own heritage report identified Bradfield Park Central as the best opportunity for a sympathetically designed new built element. A ramp in Bradfield Park Central can be undertaken with minimal impacts, and designed to complement Council's adopted master plan for Bradfield Park. The TfNSW proposed linear ramp coming to ground in Bradfield Park North works against the master plan for Bradfield Park and removes or substantially diminishes the previous improvement works Council carried out for the master plan implementation in Bradfield Park North. A solution in Bradfield Park Central can be designed to positively contribute to Place. It opens up new opportunities for all (end-of-trip & refreshment facilities, new garden and plaza areas) using the spaces beneath the ramp. It would also reduce loss of green space, which is finite and limited in North Sydney.

A superior solution in Bradfield Park Central does not need to cause delays. It would be easier to construct, as the site is self-contained and does not involve needing to construct across busy traffic and pedestrian thoroughfares. It is supported by a broader range of stakeholders, including North Sydney Council, the local community, and peak advocacy bodies for Sydney's built engineering heritage, landscape heritage and local history. The site is outside the official State and National heritage curtilage maps of the Sydney Harbour Bridge and its approaches. It would assist the approvals process to move forward – and work to the benefit of the broadest range of stakeholders.

Council urges Transport for New South Wales to work constructively and cooperatively with Council on a scheme that brings all members of the community together to achieve a positive outcome for all users of this highly valued urban environment, be they local residents, business operators, or the thousands who pass through or visit the area on a daily basis.

  
Therese Manns  
**GENERAL MANAGER**  
19/12/2022